

03 July 1996

Mr. Rodney Cash
Office of Civil Rights
US Environmental Protection Agency - MC1201
401 M Street, Southwest
Washington, D. C. 20460

Attention: Mr. Cash

Pursuant: 42 USC § 1981 the Civil Rights Act of 1964; Title II and Title VI of the Civil Rights Act; the Civil Rights Restoration Act of 1987 42 § 2000d-4a, § 2000d-4a(1)(A), § 2000d-4a(B), § 2000d-4a (3)(A)(i); Title VIII of the Civil Rights Act of 1968 42 § 3604 to 3606 and § 3631, and Presidential Executive Order 12898 this petition is to notify your office of violations of Civil Rights.

The governor of Maryland, Parris Glendening. The Prince George's County Executive, Mr. Wayne Curry. The chairman of the Prince George's County Council Stephen J. Del Giudice, and all other members of the Prince George's County Council. The Clerk of the Prince George's County Council Joyce Sweeney. The Prince George's County Planning Director Ms. Fern Piret, and Michael Pertrenko, Deputy Planning Director. The state of Maryland's Department of Transportation (MDOT) and its employees (b) (6) Personal Privacy and the Maryland State Highway consultant team firms Rummel, Klepper & Khal, Johnson Mirmiran Thompson and the Wilson T. Ballard Co. The Prince George's County Government Department of Public Works and Transportation and its employees (b) (6) Personal Privacy and (b) (6) Personal Privacy. The Prince George's County Planning Department and its employees (b) (6) Personal Privacy and (b) (6) Personal Privacy. The Maryland Department of the Environment (MDE) and its employees (b) (6) Personal Privacy and (b) (6) Personal Privacy. The Maryland National Capital Park and Planning Commission and its employees (b) (6) Personal Privacy. The Metropolitan Washington Council of Governments and its employees (b) (6) Personal Privacy. and (b) (6) Personal Privacy. The members of the National Capital Region Transportation Planning Board: Harry Thomas, Bob Cosby, Florence Burian, Derrick Berlage, Ron Spalding, William Jeffery, Richard Stevens, Betty Hager Francis, Bob Martin, Kate Hanley, Peter King, Kathy Porter, Walt Adams, Sandra Jackson, Ken Butler, John Clark, Stephen Del Guidice, Carol Petzold, John Mason, Patsy Ticer, Robert Dix, Jr., Gladys Keating, Al Eisenberg, Jeff Knoedler, Sandra Balmir, Art Smith, Lois Walker, Jane Scully, Graham Norton, Neal Herst, Michelle Pourciau, Art Lawson, Vic Wenk and Diane Pecor. Redskins Stadium, Inc. and its proprietor Mr. Jack Kent Cooke.

The above named agencies, municipalities, individuals and organizations in joint and several actions have flagrantly violated the civil rights of a minority population by "facially neutral procedures" in their efforts to increase roadway capacity in Prince George's County Maryland.

At issue are the following road construction projects:

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•MD Route 202/Brightseat Road:

- *add 1 right turn on eastbound MD Rt 202, and provide 2 free-flow right turn lanes onto southbound Brightseat Rd during ingress;
- *re-stripe southbound Brightseat Rd to provide 1 through lane, and 1 through/right turn lane during ingress;
- *remove median on Brightseat Road south of MD Rt 202 for reversible lane operation;
- *widen and re-stripe northbound Brightseat Rd to provide 3 northbound left turn lanes, 1 through lane, 1 through/right turn lane, and 1 right turn lane.

•Brightseat Road/Sheriff Road:

- *provide 5 through lanes on southbound Brightseat Rd;
- *construct new 6 lane Summerfield Blvd extended on northbound approach.

•MD Rt 214/Ritchie Road/Summerfield Boulevard:

- *add left turn lane on east bound MD Rt 214;
- *re-stripe northbound approach to provide 2 through lanes during ingress;
- *provide westbound MD Rt 214 free-flow right turn lane during ingress;
- *provide southbound Summerfield Blvd free-flow right turn lane during egress.

•MD Route 214/Brightseat Road:

- *remove median on Brightseat Rd for reversible lane operation;
- *provide second left turn lane on eastbound MD Rt 214.

•Arena Drive/Brightseat Road:

- *add 2 lanes on Arena Drive west of Brightseat Rd;
- *add 1 left turn lane on northbound Brightseat Rd.

•MD Route 214/Addison Road:

- *re-stripe to provide dual left turn lanes on northbound Addison Rd.

•Lottsford Road/Arena Drive:

- *widen and re-stripe to provide dual northbound left turn lanes, and free-flow right turn lane on eastbound Arena Dr during egress;
- *re-stripe to provide eastbound dual left turn lanes and free-flow right turn on eastbound Arena Dr during egress.

•Arena Drive:

- *construct a new 4 to 5 lane bridge over I-95;
- *construct a continuous 5 to 8 lane road between Brightseat Rd and Lottsford Rd;

•Brightseat Road:

- *add 2 to 4 lanes between Sheriff Rd and MD Rt 202 in order to achieve a continuous 6 to 7 lane section;
- *spot widening between Arena Dr and MD Rt 214 to achieve continuous 4 lane section.

•Summerfield Boulevard:

- *add 3 lanes between MD Rt 214 and existing northern terminus;
- *construct new 6 lane road from existing northern terminus to stadium site;
- *construct new 6 lane section south of Sheriff Rd to the first stadium parking lot.

•I-95/MD Route 202:

- *add new alternative slip ramp for left turns onto westbound-to-northbound directional ramp from eastbound MD Rt 202.

•I-95/MD Route 214:

- *widen southbound I-95 south of interchange to increase merge length;
- *widen northbound I-95 south of interchange to increase diverge length;
- *add new alternative slip ramp for left turns to westbound MD Rt 213 from northbound to eastbound directional ramp;

- *add new alternative slip ramp for left turns from eastbound directional ramp;
- *widen eastbound MD Rt 214 to southbound I-95 directional ramp to 2 diverge lanes, narrowing to one 1 lane prior to merge on I-95;
- *widen northbound I-95 to eastbound MD Route 214 directional ramp to 2 lanes;

•I-95/Arena Drive:

- *add 2 lane off-ramp, southbound I-95 to Arena Dr;
- *provide continuous 2 auxiliary lanes from MD Rt 202;
- *add 2 lane on-ramp, Arena Dr to southbound I-95, narrowing to 1 lane prior to merge;
- *provide continuous auxiliary lane to MD Rt 214 exit.

The economic loss due to the environmental degradation, and the harm to the quality of life, and health that members of a minority population will bare due to the road construction projects violate civil rights that are protected under Title II, Title VI and Title VIII of the Civil Rights Act. These violations will perpetuate the segregation of the area by reducing the desirability of the community.

The construction of the roads will also adversely effect a minority population restricting the enjoyment of the quality of life that the previous residentially zoned status afforded the community. The change in the residential zone status will further create a pattern of segregation by limiting the desirability of the homes in the community. The proposed road construction projects, and the harmful effects to the environment and human health associated with the increased vehicle capacity will exacerbate the flight of white residents from planning district 72 and councilmanic district 7. Further perpetuating the segregation of minorities.

The road construction projects and associated activities will cause irreparable harm to the health of members of a minority population, and violate the civil rights of minority persons. Therefore, this petition serves to request that your office use the full enforcement authority available under Title II, Title VI, Title VIII, NEPA, CAA, CWA, FHWA, FHA, FWPA, FHWA, ISTEA and all other applicable laws to take punitive actions against the above named agencies, entities, individuals and organizations responsible for violations of civil rights.

This petition also serves to request that pursuant 42 USC § 2000 a-3 of the Civil Rights Act that during the investigation into the civil rights' violations, your office enjoin Governor Glendenning, the all agencies, entities, individuals and organizations from further construction on the listed road projects.

If you require additional information, I may be contacted during hours of 10:00am - 8:00pm by telephone at: (b) (6) Personal Privacy

Sincerely,

(b) (6) Personal
Privacy

(b) (6) Personal Privacy

Mitchellville, Maryland 20721